

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHEENA M. LEE, Individually and on Behalf of All
Others Similarly Situated

Plaintiff(s)

-against-

B&Z AUTO ENTERPRISES, L.L.C. d/b/a
Eastchester Chrysler Jeep Dodge,

Defendants.

Case No. 1:19-CV-07450

**MOTION FOR EXTENSION OF
DEFENDANT'S TIME TO
RESPOND TO COMPLAINT**

The undersigned counsel on behalf of Defendant B&Z Auto Enterprises, L.L.C. d/b/a Eastchester Chrysler Jeep Dodge hereby moves this Court for a brief extension of time from today's deadline, up to and including November 1, 2019, for Defendant to answer, move, or otherwise respond to Plaintiffs' Complaint. This is Defendant's second request for an extension, and is due to the undersigned counsel being out of the office today after an automobile accident that resulted in a hospital visit. This request is made without consent because, although I telephoned Plaintiffs' counsel today concerning my situation and left a message to request consent, I was unable to obtain a response before this filing. This brief extension will not impact any other scheduled deadlines or appearances. I thank the Court for its consideration in this matter.

Dated: Garden City, New York
October 24, 2019

Respectfully Submitted,

Labonte Law Group, PLLC

By: /s/ Scott H. Mandel
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Counsel for Defendant

CERTIFICATION

I hereby certify that on October 24, 2019, a copy of the foregoing **Motion for Extension of Time to File an Answer** was electronically filed and served via CM/ECF to all counsel of record.

By: /s/ Scott H. Mandel
Scott H. Mandel, Esq.